

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

Joseph Stanley Pigott a.k.a. King Abdul Mumin
El,

Plaintiff,

v.

Heather Winslow Barr, David P. Tracy
(individual Jointly & Severally) Law Offices of
David P. Tracy & Zottman, Sarah Hudson
(individual Jointly & Severally) d.b.a. King
County Superior Court Bailiff, Attorney Kristin
Richardson (individual Jointly & Severally) d.b.a
King County Superior Court Judge, Attorney
Kathryn D. Fields (individual Jointly & Severally)
d.b.a. King County Superior Court Judge, King
County Superior Court, State of Washington, et al.,

Defendant.

Case No. 2:19-cv-01489 RSM

KING COUNTY DEFENDANTS'
ANSWER

Defendants Sarah Hudson, Judge Kristin Richardson, Commissioner Pro Tempore
Kathryn Fields, King County Superior Court and King County (hereinafter "King County
Defendants") in answer to plaintiff's Complaint, admit, deny and state as follows:

I. THE PARTIES TO THIS COMPLAINT

No response is required. To the extent that factual assertions are made that must be
admitted or denied, King County Defendants deny any factual assertions made.

KING COUNTY DEFENDANTS' ANSWER - 1

Daniel T. Satterberg, Prosecuting Attorney
CIVIL DIVISION, Contracts Section
900 King County Administration Building
500 Fourth Avenue
Seattle, Washington 98104
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II. BASIS FOR JURISDICTION

King County Defendants deny that there is diversity of citizenship or a federal question raised by this suit and thus deny that there is a basis for federal jurisdiction.

III. THE AMOUNT IN CONTROVERSY

King County Defendants deny that that Plaintiff is entitled to any compensation or damages from King County Defendants.

IV. STATEMENT OF CLAIM

King County Defendants admit that the location of the events that are the basis for this suit is King County Superior Court.

King County admits only that court hearings were held on 17-3-05075-3 SEA on 10/2/18, 3/22/19, 4/25/19, and 9/6/19. King County admits only that a court hearing was held in 19-2-10040-1 SEA on 7/5/19. King County Defendants deny for lack of knowledge what acts Plaintiff is alleging occurred on 5/6/19.

1. Denied.

2. Denied.

3. Denied.

4. Denied.

5. Denied.

6. Denied.

7. Denied.

8. King County Defendants admit only that Plaintiff filed a suit against such persons under cause number 19-2-10040-1 SEA. All other allegations are denied.

9. Denied.

1 10. Denied.

2 11. Denied.

3 12. Denied.

4 13. Denied.

5 14. King County Defendants admit only that Judge McHale dismissed Plaintiff's suit
6 under cause number 19-2-10040-1 SEA. All other allegations are denied.

7 15. Denied.

8 16. Denied

9 17. Denied for lack of knowledge.

10 18. Denied.

11 19. Denied.

12 20. Denied.

13 21. Denied.

14 22. Denied for lack of knowledge.

15 23. Denied for lack of knowledge.

16
17 **V. IRREPARABLE INJURY**

18 Denied.

19 **VI. RELIEF**

20 King County Defendants deny that Plaintiff is entitled to recover any relief against
21 King County Defendants as outlined in this section.

22 King County Defendants deny any remaining allegations contained in Plaintiff's
23 complaint not expressly admitted herein.

1 BY WAY OF FURTHER ANSWER and AFFIRMATIVE DEFENSES, and without
2 admitting anything previously denied, King County Defendants states as follows:

- 3 1. Plaintiff has failed to state a claim upon which relief may be granted.
- 4 2. King County Defendants are immune from suit.
- 5 3. Plaintiff's injuries and damages, if any, were proximately caused by the negligence
6 and/or fault of the plaintiff.
- 7 4. Plaintiff has failed to mitigate its damages, if any.
- 8 5. Process and service of process are insufficient.
- 9 6. Plaintiff's claims are barred by res judicata, judicial estoppel and/or collateral estoppel.
- 10 7. Plaintiff's suit was filed in violation of Fed. R. Civ. P. 11.

11 King County Defendants reserve the right to amend this answer, including these
12 affirmative defenses, if and when additional facts are discovered which support such
13 amendments.

14 DATED this 23rd day of October, 2019.

16 DANIEL T. SATTERBERG
17 King County Prosecuting Attorney

18 By: /s/ Samantha Kanner
19 SAMANTHA KANNER, WSBA #36943
20 Senior Deputy Prosecuting Attorney
21 500 Fourth Ave., Suite 900
22 Seattle, WA 98104
23 Samantha.Kanner@kingcounty.gov
Attorneys for King County Defendants

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2019, I electronically filed the foregoing document with the Clerk of the Court using the electronic filing system and sent the same in the manner noted below to the following:

Joseph Stanley Pigott
604 S 162nd St
Burien, WA 98148
Pro Se Plaintiff

Via USPS, First Class Mail

Mathew J. Cunanan
DC Law Group
12055 15th Ave NE
Seattle, WA 98125
*Attorneys for Barr, Tracy, and Law Offices
of David P Tracy & Zottman*

Via CM-ECF Electronic Notification

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 23rd day of October, 2019.



HEIDI LAU
Paralegal
King County Prosecuting Attorney's Office